

EXHIBIT Y



Integrity Builds Trust

OUR CODE OF CONDUCT

When to Speak Up

Building trust requires we do the right thing and speak up if we have questions or concerns. If you don't know the right thing to do, ask for advice from your manager, your People Lead, or Ethics & Compliance. Ethics & Compliance can provide you with an opinion on the right action to take. Make your voice heard and get the answers you need.

If you see, suspect, or are told about activity that violates our Code, compliance policies, the Standards for Suppliers, or the law, you must report it. Looking the other way or letting someone else take the lead may seem easier, but unethical or unlawful behavior hurts us all. It erodes trust. Report your concerns and cooperate fully and honestly in all internal investigations.

How to Speak Up

 **Most concerns can be reported to your manager, People Lead, Ethics & Compliance, or Legal.**

However, if your concern is about one of the following, it must be immediately reported directly to Global Ethics & Compliance:

- **Bribery (including any suspected violation of our Anti-Corruption Compliance Policy)**
- **A company officer or direct report to any company CEO potentially violating our Code**
- **Falsifying financial records or interfering with our internal controls on accurate financial reporting**

Global or local policies may indicate additional matters that must be reported directly to Ethics & Compliance.

All reports to Ethics & Compliance are treated as confidentially as possible. It helps with follow-up if you identify yourself. If you are not comfortable identifying yourself, you can make anonymous reports to the Ethics Helpline to the extent allowed by law.



Ways to Reach Out



Talk to your manager, next-level manager, People Lead, Ethics & Compliance, or Legal.



www.walmartethics.com



ethics@walmart.com



800-963-8442 (1-800-WM-ETHIC) in the U.S., Canada, and Puerto Rico, or your local phone number which is listed at the end of our Code. The Ethics Helpline is available 24 hours a day, 7 days a week and is available in most local languages.



Walmart Inc.

Attention: Global Ethics & Compliance, 702 SW 8th Street, Bentonville, AR 72716-0860